

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**DECLARATION OF ELYSSA SULLIVAN**

I, Elyssa Sullivan, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called as a witness.
2. On Tuesday, October 3, I participated in a public action and protest to express my concerns about police brutality and racism in the criminal justice system.
3. The action was centered around Interstate 64 near the Compton Avenue overpass.
4. I saw pedestrians gathered on highway overpasses to cheer on the public action.
5. I did not commit, or see any other protestor commit, any act of violence or pose any threat to any person or property.
6. As I was marching on the sidewalk adjacent to Jefferson Avenue, I heard a muffled announcement over a bullhorn, and I did not know if it was a police officer or a protest organizer.
7. I asked a police officer standing near me with a bicycle whether he could hear the announcement.

8. He did not respond verbally, but he flicked on the headlamp of his bicycle helmet, so I turned away.

9. I asked another nearby St. Louis Metropolitan police officer what was being said.

10. The officer told me to leave or be arrested.

11. I attempted to comply but the officer blocked my route of egress.

12. I asked, "But didn't you just tell me to leave?"

13. He responded, "Shut your bitch ass mouth."

14. I saw other people who had not been participating in the protest leave the Residence Inn south of Interstate 64 and a nearby gas station and walk on the sidewalk where the protestors were.

15. The police called out that everyone should sit down on the sidewalk, and I complied.

16. I was arrested.

17. Other people who were not participating in the protest were arrested.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 11 day of October, 2017.

By: Elyssa Sullivan  
Elyssa Sullivan